

CONFIDENTIAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
Administration of the North) CC Docket No. 92-237
American Numbering Plan) Phases One and Two

COMMENTS
OF THE
ROCK HILL, FORT MILL AND LANCASTER TELEPHONE COMPANIES

The Rock Hill Telephone Company (RHTC), Fort Mill Telephone Company (FMTC) and Lancaster Telephone Company (LTC) (Companies) submit these comments in response to the Notice of Proposed Rulemaking (NPRM) released by the FCC on April 4, 1994.

I. INTRODUCTION.

In the NPRM, the Federal Communications Commission (Commission) requested comments on tentative conclusions and proposals to transfer the North American Numbering Plan (NANP) Administration function from the current administrator, Bellcore. The NPRM was primarily concerned with the structure and operation of a NANP Administration function, the formation and location of a policy body, funding, and guidelines for conduct of the NANP mission. In addition the Commission sought comment on CIC expansion and transition periods, and the implementation of "presubscribed 1+" for interstate intraLATA toll calls.

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II. NANP ADMINISTRATION AND POLICY ISSUES

Generally the Companies support the comments and suggestions of the USTA as regards the duties, funding, structures, operations and management of a new NANP Administration. We agree that, where possible, the Commission should utilize existing telecommunications industry organizations, structures and forums as building blocks to fashion the new NANP organization.

III. INTERSTATE, INTRALATA TOLL CALLS

In the NPRM the Commission invited interested parties to comment on the timing, costs and benefits of modifying the current Local Exchange Carrier (LEC) treatment of intraLATA, interstate toll traffic.

Interstate intraLATA toll traffic from the service areas of the Companies filing these Comments is currently handled by the LEC unless the calling party chooses an Interexchange Carrier (IXC) by dialing a 10XXX prefix.

Numerous claims have been made in dockets before the FCC and state Public Service Commissions (PSC) that offering subscribers choices for services, features and vendors is in the public interest. However, the possible benefits to predominantly toll users must be weighed against the possible damage to predominantly local users and the goal of universal

service. Additional LEC costs and potential loss of LEC revenues could adversely impact local service rates and universal service.

We are concerned that the proposal by the Commission to require "presubscription for 1+" interstate intraLATA toll traffic would have serious impact on basic local service rates of the Companies filing these Comments.

These Companies are located in South Carolina, but are associated with and are part of the Charlotte, North Carolina LATA (422). The Companies are small, independent, average schedule telephone companies participating in the NECA Interstate tariff and revenue pools. Approximately 2/3 of these Companies' intralata toll billing is interstate.

The importance of each and every revenue stream to a small independent telephone company cannot be overemphasized. For the Companies commenting, the intraLATA toll revenue is critical to their ability to provide quality local telecommunications services to their subscribers at affordable prices. Implementation of interstate intraLATA presubscription could seriously jeopardize this revenue stream for these companies.

We urge the Commission to refrain from broadly mandating "presubscribed 1+" for interstate intraLATA toll traffic without some provision for recognizing significantly different circumstances of individual states. The state PSCs are responsible for the level of local service rates and can best assess the effect of intraLATA equal access on those rates and the most appropriate timing for implementation of intraLATA equal access.

If the Commission concludes presubscription of 1+ interstate intraLATA toll traffic to be in the long term public interest, some provision should be made for implementation in a particular LATA to be delayed by an affected state until intrastate intraLATA equal access has been authorized by the PSCs of both of the states affected by the change.

Respectfully submitted,

ROCK HILL TELEPHONE COMPANY
FORT MILL TELEPHONE COMPANY
LANCASTER TELEPHONE COMPANY

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